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July 1, 2025

VIA CM/ECF

The Honorable Mitchell S. Goldberg, Chief Judge
United States District Court
for the Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse, Room 17614 601
Market Street Philadelphia, PA 19106-1797

**Re: *Mother's Ale, LLC v. Federal Deposit Insurance Corporation as Receiver
for Republic First Bank dba Republic Bank, Case No. 2:25-cv-01641-MSG***

Unopposed Request for Extension of Time to Respond to Complaint

Dear Chief Judge Goldberg:

My firm represents defendant Federal Deposit Insurance Corporation as Receiver for Republic First Bank d/b/a Republic Bank ("FDIC-Receiver") in this case. I write pursuant to Section 7 of Your Honor's Policies and Procedures for Civil Matters to request a further extension – to July 31, 2025 – for FDIC-Receiver to respond to the complaint. The current deadline is July 9, 2025. We have conferred with counsel for plaintiff Mother's Ale, LLC ("Mother's Ale"). Mother's Ale does not oppose this request.

As Your Honor may recall, on April 26, 2024, the Pennsylvania Department of Banking and Securities closed Republic Bank, and named the FDIC as receiver. On or about August 15, 2024, Mother's Ale filed an administrative claim with the FDIC-Receiver claiming \$296,378.20 in damages for an alleged flood that occurred immediately before Mother's Ale purchased a property and liquor license from Republic Bank. The FDIC-Receiver disallowed Mother Ale's claim on or about January 28, 2025. On March 28, 2025, Mother's Ale filed this lawsuit against the FDIC-Receiver.

In accordance with Section 1 of Your Honor's Policies and Procedure, the parties recently conferred regarding Mother's Ale's claims, the background of the case, and other matters. They have scheduled another meet and confer during the week after the upcoming holiday. The parties anticipate that they will either resolve potential objections to the complaint by the requested July 31, 2025 extension date, or raise them by way of letter to the Court by that

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date.

Thank you for considering this request.

Respectfully submitted,



Jonathan W. Hugg
FOR ECKERT SEAMANS CHERIN
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cc: All counsel of record via CM/ECF

Federal Deposit Insurance Corporation
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COMBINED CERTIFICATES

I certify that on July 1, 2025:

1. A true and correct copy of the foregoing Letter Request for Extension was filed electronically via the Court's CM/ECF system and served via CM/ECF on all counsel of record; and
2. I conferred by Microsoft Teams conference call with plaintiff's counsel on June 30, 2025, and subsequently by email, and he agreed to the relief requested in the foregoing Letter Request.



Jonathan W. Hugg, Esquire